

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT A:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Attorney for Plaintiffs on Exhibit A

Dated: November 2, 2016

EXHIBIT A – ROBINSON CALCAGNIE ROBINSON SHAPIRO DAVIS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-00881	Peggy Juarez v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.
2:12-CV-01349	Rhonda Blanton v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.
2:12-CV-01763	Pamela Haley v. Ethicon, Inc., American Medical Systems, Inc., Cook Biotech, Inc., Cook Medical, Inc., Johnson & Johnson, Cook Incorporated
2:12-CV-02375	Linda Wankowski, Robert Wankowski v. Johnson & Johnson, Ethicon, Inc., C.R. Bard, Inc., Sofradim Production SAS, American Medical Systems, Inc.
2:12-CV-08761	Helon Chapman, Edward W. Chapman v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-CV-09339	Cynthia Schroeder v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-03779	Gerin Pebbles, Lewis Pebbles v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-13389	Barbara Brock, Dwight Brock v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-13807	JoAnn deBorja v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-16466	Mary Kicklighter v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C.R. Bard, Inc., Tissue Science Laboratories Limited
2:13-CV-16471	Mary McLemore, Larry McLemore, v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-18127	Reba Wright v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-26091	Robin Jackson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C.R. Bard, Inc., Tissue Science Laboratories Limited
2:13-CV-31532	Carol Williams v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2016 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis